

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

SONJA ROBERTS, )  
                        )  
Plaintiff,           )  
                        )  
v.                     ) CIVIL ACTION  
                        )  
ATLANTA METROPOLITAN STATE ) FILE NO.  
COLLEGE, LAURETTA HANNON, and )  
UNIVERSITY SYSTEM OF GEORGIA, )  
                        )

Defendants.

**NOTICE OF REMOVAL**

Defendants Atlanta Metropolitan State College (“Atlanta Metro”), Lauretta Hannon (“Hannon”), and University System of Georgia (“USOG”) (collectively the “Defendants”), by and through their undersigned counsel and pursuant to 28 U.S.C. §§ 1441(a) and 1446, hereby file this Notice of Removal and show this Court as follows:

1.

On December 21, 2020, Plaintiff filed a lawsuit in the Superior Court of Fulton County, Georgia captioned as Sonja Roberts v. Atlanta Metropolitan State College, Lauretta Hannon, University System of Georgia. This lawsuit was assigned Civil Action File No. 2020-CV-343859. True and correct copies of the Complaint, as well as all other process, orders or pleadings received by the

Defendants by service or otherwise in this action are attached hereto as **Exhibit A** as required by 28 U.S.C. §1446(a).

2.

The United States District Court for the Northern District of Georgia, Atlanta Division, includes Fulton County. Accordingly, removal to this Court is proper under 28 U.S.C. § 1441(a).

3.

Plaintiff's Complaint alleges violations of the Age Discrimination in Employment Act 29 U.S.C. §§621-634, Title VII of the Civil Rights Act of 1964, 42 U.S.C. §§ 2000e, *et seq.* ("Title VII"), 42 U.S.C. §§ 1983 and 1985, Family Medical Leave Act 29 U.S.C. § 2601, Georgia Constitution, Fair Employment Practice Act O.C.G.A. § 45-19-29 – 45-15-45, Atlanta Code Ordinances § 94-11, *et seq.*, and tort claims under common law.

4.

As a result, the United States District Court for the Northern District of Georgia, Atlanta Division, has jurisdiction over this matter pursuant to 28 U.S.C. §§ 1331, 1441(b), and 1441(c) and other applicable laws, as this case is a civil action under the Constitution and/or laws of the United States.

5.

To the extent Plaintiff alleges claims under state law, this Court has supplemental jurisdiction pursuant to 28 U.S.C. § 1337 because such claims are part of the same case or controversy that gives rise to Plaintiff's claims under federal law.

6.

On January 6, 2021, Plaintiff served Defendants. As such, Defendants have timely filed their Notice of Removal within the 30-day time limit imposed by 28 U.S.C. § 1446(b).

7.

Promptly after filing this Notice of Removal, written notice of this filing will be provided to Plaintiff and a copy of this Notice of Removal will be filed with the Superior Court of Fulton County, State of Georgia. A copy of the Notice to Plaintiff of Removal of State Court Action is attached hereto as **Exhibit "B"**. Exhibit B will be served on all adverse parties.

8.

By filing this Notice of Removal, Defendants do not waive any defense that may be available to them.

WHEREFORE, Defendants respectfully request this Court assume full jurisdiction of the controversy now pending between Plaintiff and Defendants in the Superior Court of Fulton County as provided by law.

Respectfully submitted, this 4<sup>th</sup> day of February 2021.

**GREGORY, DOYLE, CALHOUN  
& ROGERS, LLC**

/s/ William P. Miles, Jr.

William P. Miles, Jr.  
Georgia Bar No. 505828  
T. Owen Farist  
Georgia Bar No. 560550

49 Atlanta Street  
Marietta, Georgia 30060  
(770) 422-1776 – telephone  
(678) 784-3527 – facsimile  
[wmiles@gdclaw.com](mailto:wmiles@gdclaw.com)  
[ofarist@gdclaw.com](mailto:ofarist@gdclaw.com)  
*Attorneys for Defendants*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

SONJA ROBERTS, )  
                        )  
Plaintiff,           )  
                        )  
v.                     ) CIVIL ACTION  
                        )  
ATLANTA METROPOLITAN STATE ) FILE NO.  
COLLEGE, LAURETTA HANNON, and )  
UNIVERSITY SYSTEM OF GEORGIA, )  
                        )

Defendants.

**CERTIFICATE OF SERVICE**

I hereby certify that on this day 4<sup>th</sup> day of February 2021, I served a copy of the foregoing **NOTICE OF REMOVAL** upon all parties to this matter by depositing a true copy of same via United States mail, proper postage prepaid, addressed to Plaintiff's Counsel, as follows:

Christopher C. Roberts, Esq.  
7 Glenwood Avenue,  
Suite 401  
East Orange, NJ 070107

This 4<sup>th</sup> day of February 2021.

**GREGORY, DOYLE, CALHOUN  
& ROGERS, LLC**

/s/ William P. Miles, Jr.